

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

In re:

TERI GALARDI,

Debtor.

Case No. 22-50035-JPS

Chapter 11

Joseph Guernsey d/b/a Red Shield Funding,

Movant,

v.

**Ms. Astrid Gabbe, Esq. Mr. Jason Orenstein, Esq. &
Mr. Christopher Kosachuk, Esq.,**

Respondents.

NOTICE OF FILING THE DECLARATION OF JENISEE LONG (CLAIM NO. 115)

Now Comes Mr. Joseph Guernsey d/b/a Red Shield Funding (RSF) and files the declaration of Jenisee Long in support of the **MOTION OF JOSEPH GUERNSEY DBA RED SHIELD FUNDING TO ENFORCE THE AUTOMATIC STAY, THE CONFIRMATION ORDER AND FOR SANCTIONS AGAINST MS. ASTRID GABBE AND HER ATTORNEY MR. JASON ORENSTEIN** (Doc 606).

On October 6, 2023 Respondents fraudulently attempted to have a judgment entered against Ms. Long and in favor of non-party Ms. Astrid Gabbe by filing a consent motion in the district court.
Date: October 20, 2023

Signature: /s/ Joseph Guernsey
Address: 1616 Ocean Drive, #101
Vero Beach, FL 32961

Certificate of Service

This is to certify that I have filed, utilizing the cm/ecf system, the foregoing **NOTICE OF FILING THE DECLARATION OF JENISEE LONG (CLAIM NO. 115)** and that all parties of record will be served.

Service by U.S. Mail and email:

Mr. Chris Kosachuk
854 Pheasant Run Rd.
West Chester, PA 19382-8144
chriskosachuk@gmail.com

Attorney for Ms. Gabbe

Dated this 20th day of October, 2023.

Signature: /s/ Joseph Guernsey

**UNSWORN DECLARATION OF JENISEE LONG
UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. SEC. 1746
MADE TO INFORM THE COURT MS. GABBE COMMITTED FRAUD AND IS
CURRENTLY TRYING TO STEAL MY CLAIM NO. 115**

1.

My name is Jenisee Long. I file this declaration because the Darden court in Miami, FL will most likely sign the Consent Judgment and want it to be known to the world that attorneys' Ms. Gabbe, Mr. Orenstein and Mr. Kusachuk have engaged in rank fraud to steal my bankruptcy claim!

2.

As of today, I am the owner of claim number 115 in bankruptcy court and former client of Ms. Astrid Gabbe. I terminated representation around March, 2022.

3.

I say as of today because once the Consent Order is signed by the judge Ms. Gabbe and her lawyers Mr. Orenstein and Mr. Kusachuk will argue I am now longer entitled to any payments from the liquidating trust, they are all to go Ms. Gabbe, as my lawyer, that I fired last year!

4.

On October 6, 2023 Ms. Gabbe filed the UNOPPOSED MOTION TO APPROVE CONSENT JUDGMENT and filed a CONSENT JUDGEMENT (EXHIBIT A).

5.

On the same day I was contacted by Mr. Tom McClendon, the Ch. 11 liquidating trustee and asked if I had consented to the entry of the order filed by Ms. Gabbe and I said that I did not consent because I have not spoken to Ms. Gabbe.

6.

If Ms. Gabbe did ask for my consent I would have said NO!

7.

The last time I spoke to or had any communication with Ms. Gabbe was around April, 2022 when I fired her. I see now she never withdrew from the case. Ms. Gabbe and Mr. Kusachuk have contacted me through telephone and text but I have not responded.

8.

The CONSENT JUDGMENT states that I agreed to all the following:

To be clear, the first \$134,341.32 of this claim recovery must be paid to satisfy the attorney charging lien first before any recovery may be had by Ms. Long. The next \$249,491.64 goes to Jenisse Long the owner of the claim which equals the total amount due of \$383,832.96. In the event of a lesser recovery Movants seek entry of this Consent Judgment to participate in recovery pari-passu at a rate of 35% to Ms. Gabbe and 65% to her client Ms. Long to avoid a perverse outcome under Florida Lien law whereby Ms. Gabbe would receive the majority of the recovery or more than her client Ms. Long.

This Consent Judgment also authorizes Ms. Gabbe to engage local or other counsel on behalf of Ms. Long to protect her rights in this claim and further authorizes Ms. Gabbe to collect on this claim and hold the 65% interest in her attorney trust account only to be disbursed upon further Motion to Approve Consent Judgment and corresponding Consent Judgment on Disbursement from this Court. This Consent Judgment authorizes Ms. Gabbe to enter into a further contingency fee agreement with any attorney necessary and agree to pay said attorney 10% of the aggregate recovery, the cost of which to be taxed 5% to Ms. Gabbe and 5% to Ms. Long only to be disbursed by further order of this Court.

9.

Ms. Gabbe was fired and through the Consent Judgment Ms. Gabbe and by extension Mr. Orenstein and Mr. Kusachuk are stealing my entire claim. The Consent Judgment states that the entire claim is to be paid to Ms. Gabbe! HOW IS SHE EVEN A LAWYER WHEN SHE IS STEALING \$134,341.32 FROM ME!

10.

The Consent Judgment says that I agree to pay \$134,341.32 to Ms. Gabbe and whatever

is not collected from the liquidating trust will be collected through another attorney until the entire judgment is paid.

11.

THIS IS CRAZY! SHE DID NOTHING, SHE FILED A CASE AND THERE IS NO CONTRACT WHERE I AGREED TO ANYTHING.

12.

I was never served by mail even though the certificate of service states that I was served.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED ON October 19, 2023.

/s/ Jenisee Long

Jenisee Long
2107 Center Street,
Covington, KY 41014